

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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WHITE PLAINS HEALTHCARE PROPERTIES I, :  
LLC, :  
 : CIVIL ACTION NO.: 21-9048  
Plaintiff, :  
 : Removed from:  
-against- :  
 : Supreme Court of the State of  
HBL SNF, LLC, LIZER JOZEFOVIC A/K/A LIZER : New York, Westchester County  
JOZOFOVIC, and MARK NEUMAN, :  
 :  
Defendants and Third-Party Plaintiffs, :  
 :  
-against- :  
 :  
CCC EQUITIES, LLC, PROJECT EQUITY :  
CONSULTING, THE CONGRESS COMPANIES, :  
HOWARD FENSTERMAN, WILLIAM :  
NICHOLSON, and METROPOLITAN :  
COMMERCIAL BANK :  
 :  
Third-Party Defendants  
-----X

**NOTICE OF REMOVAL**

TO: THE JUDGES OF THIS UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

HBL SNF, LLC (the “Removing Defendant”), gives notice of removal of the entirety of the above-captioned lawsuit (“State Court Action”) from the Supreme Court of the State of New York, County of Westchester, to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. §§ 1334(b) and 1452. As grounds for removal, Removing Defendant states as follows:

## **BACKGROUND**

1. In or around November 2015, the Removing Defendant entered into certain agreements with White Plains Healthcare Properties I, LLC (“WPHCP”) for the construction and finance of the Removing Defendant’s care facility. The Removing Defendant executed that certain Development Agreement (as amended or modified from time to time, the “Development Agreement”), dated as of November 19, 2015, between the Removing Defendant, as operator/tenant, and WPHCP, as developer which was subject to the prior approval of the New York State Department of Health

2. In connection therewith, the Removing Defendant additionally entered into that certain Amended and Restated Operating Lease (as amended or modified from time to time, the “Lease” and, together with the Development Agreement, the “Development and Lease Agreements”), dated November 19, 2015, by and between the Removing Defendant, as tenant, and WPHCP, as Landlord. The Lease provides that it commences upon the date WPHCP’s work is sufficiently complete to accept patients as determined by the New York State Department of Health (the “NYSDOH”) and the issuance of a Certificate of Occupancy.

3. Pursuant to the Development and Lease Agreements, WPHCP agreed to provide the necessary financing and construction management, and to obtain the necessary NYSDOH authorizations and approvals of its plans, specifications and construction and mortgage financing, in order to deliver to the Removing Defendant a “turn-key” facility for operation by the Removing Defendant as a skilled nursing and rehabilitation facility. The Removing Defendant, as tenant and operator of the completed facility, agreed to pay, among other things, monthly fixed rent in the amount of \$506,096.50 for an annual amount of fixed rent of \$6,073,158, to WPHCP, as landlord, over the thirty-year term of the Lease.

4. The Lease provides that the Removing Defendant's obligations to WPHCP under the Lease are secured by, among other things, a first priority security interest and lien granted to WPHCP upon all of the Removing Defendant's assets, including personal property, equipment, and accounts receivable, and certificates of need and other authorizations of the Removing Defendant with respect to operation of the facility as a skilled nursing facility. The Lease provides that WPHCP agrees to subordinate its lien on accounts receivable in favor of an accounts receivable lender to the Removing Defendant upon certain conditions set forth therein.

5. As of the Petition Date, there is no enforceable UCC-1 Financing Statement of record filed against the Removing Defendant by or on behalf of WPHCP.

6. In furtherance of its obligation to secure financing for the project, WPHCP entered into that certain Construction Loan Agreement (as amended or modified from time to time, the "Loan Agreement"), dated as of August 18, 2017, by and among WPHCP, as borrower, Security Benefit Life Insurance Company, as lender ("Security Benefit Lender"), and Security Benefit Corporation (together with Security Benefit Lender, "Security Benefit"), as agent, whereby Security Benefit Lender would make loans to WPHCP in an aggregate amount of up to \$38,500,000, to be used to refinance an existing mortgage on the Real Property, pay the costs of construction and development of the facility, pay the costs of the beds, furniture, fixtures, personal property and equipment to be used at the facility, pay utilities fees and charges, and pay interest, taxes and other budgeted operating costs.

7. WPHCP's obligations under the Loan Agreement are secured by, among other things, that certain Mortgage, Assignment of Leases and Rents, Security Agreement and Fixture Filing (the "Mortgage"), recorded August 31, 2017, granted by WPHCP to Security Benefit, and an Assignment of Leases and Rents (the "Assignment of Rents"), dated as of August 18, 2017, assigning all rents in

and under all leases with respect to the Real Property. The Mortgage provides that WPHCP's obligations are secured by liens on real and personal property and all other rights and interests of WPHCP in the Real Property. However, property of the Removing Defendant is expressly excluded from Security Benefit's Mortgage, which provides that "all property of tenants under any Lease...is excluded from the scope of this Security Instrument."

8. In connection with the financing, WPHCP, Security Benefit and the Removing Defendant, as operator, entered into that certain Security Agreement, Assignment of Leases and Rents and Fixture Filing, dated as of July 2017 (the "Security Agreement"), which provides for the Removing Defendant's grant of a security interest in favor of Security Benefit in all of its assets constituting Collateral Property (as defined therein) as security for the payment and performance of, among other things, WPHCP's obligations under the Loan Agreement. With respect to the Removing Defendant's accounts receivable, Security Benefit's liens were granted "to the extent, but only to the extent, they are used in connection with or arise from the operation of the Collateral Property that are or will be subject to an Intercreditor Agreement with the [Removing Defendant's] AR Lender."

9. Security Benefit filed a UCC-1 Financing Statement perfecting this security interest against the Removing Defendant on September 19, 2017. The Removing Defendant is not a party to the Loan Agreement and does not owe any amounts thereunder to Security Benefit. To the best of the Removing Defendant's knowledge, the balance owed by WPHCP to Security Benefit under the Loan Agreement was approximately \$41,742,537.06 as of May 1, 2021.

10. After developmental and financing delays necessitating additional capital infusions, WPHCP obtained approval from the New York State Department of Health for the opening of the facility on December 2, 2019, two years later than contemplated under the Development Agreement.

Despite this and other disputes concerning the Development and Lease Agreements, the Removing Defendant made all rent payments of over \$506,000 per month as required under the Lease, commencing on October 30, 2019 (even before the opening of the facility and commencement of the Lease), totaling over \$10,500,000 as of the Petition Date, which WPHCP accepted.

11. Despite the fact that the Removing Defendant did not default under the Lease, WPHCP defaulted under its Loan Agreement with Security Benefit. Security Benefit issued multiple notices of default to WPHCP, commencing on October 16, 2019, for defaults including failures to establish a cash management account, make monthly interest payments, forward payments received from the Removing Defendant, provide financial statements, and other defaults.

12. Security Benefit commenced litigation against WPHCP attempting to foreclose against the Real Property, but these actions were discontinued as a result of a New York State moratoriums on such actions, which has been extended through January 2022. *See Security Benefit Life Insurance Company, Security Benefit Corporation v. White Plains Healthcare Properties I, LLC, et al.*, Index No. 55883/2021 (Sup. Ct. N.Y. 2021); *Security Benefit Life Insurance Company, Security Benefit Corporation v. White Plains Healthcare Properties I, LLC, et al.*, Index No. 621099/2021 (Sup. Ct. N.Y. 2021).

13. On January 7, 2020, attorneys for WPHCP sent the Removing Defendant a letter alleging that the Removing Defendant defaulted under the Development and Lease Agreements, purporting to terminate the Lease effective January 13, 2020, and seeking accelerated obligations allegedly due in the amount of \$84,073,989.91. The Removing Defendant disputes these alleged defaults and the effectiveness of the letter to terminate the Lease. As of the Petition Date, the Removing Defendant was in substantial compliance with the Lease and has made all outstanding rental payments to WPHCP.

14. On September 18, 2020, WPHCP filed a complaint against the Removing Defendant, Lizer Jozefovic, and Mark Neuman in the Supreme Court of the State of New York, County of Westchester (the “Complaint”), captioned as *White Plains Healthcare Properties I, LLC v. HBL SNF, LLC, et al.*, Index No. 60278-20 (N.Y. Sup. Ct. 2020) (the “State Court Action”), containing various frivolous allegations regarding purported defaults by the Removing Defendant under the Lease, seeking termination of the Lease and seeking recovery from the Removing Defendant and co-defendants for over \$84 million in alleged damages. WPHCP subsequently amended its Complaint.

15. The Removing Defendant and co-defendants filed an answer to the amended Complaint and asserted counterclaims and third-party claims against WPHCP, among others, seeking a declaratory judgment as well as an accounting, and money damages based upon fraud, fraud in the inducement, breach of contract, bad faith.

16. On August 19, 2021, WPHCP filed a motion seeking entry of summary judgment against the Removing Defendant, among others. As of the Petition Date, the Removing Defendant had filed its opposition to WPHCP’s summary judgment motion, but WPHCP had not yet filed its reply brief. WPHCP’s motion has not yet been deemed to be fully submitted and remains *sub judice*.

17. Removal of the State Court Action is appropriate because this Court maintains “arising under” and “related to” bankruptcy jurisdiction pursuant to 28 U.S.C. §§ 1334(b) and 1452(a).

### **Bankruptcy Jurisdiction**

18. On November 1, 2021, the Removing Defendant filed a voluntary petition for relief under Subchapter V of Chapter 11 of the United State Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York. The case number for the Removing

Defendant's chapter 11 case is Chapter 11 Case No. 21-22623-SHL (the "Chapter 11 Case"). The Chapter 11 Case is pending before the Honorable Sean H. Lane, United States Bankruptcy Judge.

19. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1334(b), which provides that United States district courts shall have jurisdiction over all civil proceedings, "arising under" or "related" to cases under title 11 of the United States Code (the "Bankruptcy Code").

20. The causes of actions asserted by in the State Court Action are "core proceedings" within the meaning of, inter alia, 28 U.S.C § 157(b)(2)(B), (C), (E), and (O) in that the State Court Action concerns, inter alia, (i) allowance or disallowance of claims against the Removing Defendant's bankruptcy estates; (ii) counterclaims by the Removing Defendant against Plaintiffs who hold claims against the Removing Defendant's bankruptcy estates; (iii) third party claims by the Removing Defendant; (iv) termination of the Removing Defendant's Lease, and (v) other matters pertaining to the liquidation of the assets of the estate and the adjustment of the debtor-creditor relationship.

21. Alternatively, the causes of action in the State Court Action are "related to" the Chapter 11 Cases because:

- a. Plaintiff seeks a judgment against the Removing Defendant, which "could conceivably have" an effect on the Removing Defendants' bankruptcy estates;
- b. Plaintiff seeks to terminate Removing Defendant's Lease which "could conceivably have" an effect on the Removing Defendants' bankruptcy estates;
- c. Plaintiff seeks judgment against non-debtor defendants and individuals based upon guaranties of certain of Removing Defendant's obligations under the Lease. As a result, non-Removing Defendants may seek contribution or indemnification from

Removing Defendant, which “could conceivably have” an effect on the Removing Defendant’s bankruptcy estate; and

- d. Plaintiff seeks judgment against non-debtor defendants under certain guaranties of the Debtor’s obligations under the Lease. Judgments entered against and amounts collected from non-debtor defendants could have the effect of fixing the amounts owed, if any, by Removing Defendant under the Lease, or otherwise determining the Removing Defendant’s liability for alleged defaults under the Lease. As a result, a judgment against the non-debtor defendants “could conceivably have” an effect on the Removing Defendant’s bankruptcy estate.

*See In re Cuyahoga Equip. Corp.*, 980 F.2d 110, 114 (2d Cir. 1992) (“The test ... is whether [the litigation’s] outcome might have any conceivable effect on the bankrupt estate.”). An action is “related to” a bankruptcy proceeding even when the claims are between third parties. *Celotex Corp. v. Edwards*, 514 U.S. 300 (1995)(resolving a circuit split by holding that a dispute between parties other than the debtor may be “related to” bankruptcy although the debtor has no interest in the property over which the parties are in dispute).

22. Courts have regularly held that third party proceedings are “related to” bankruptcy proceedings when the defendants have a claim for indemnification or contribution against the debtor estate even where the rights are contingent. *See In re Worldcom, Inc. Sees. Litig.*, 293 B.R. 308, 321 (S.D.N.Y. 2003)(“Because the effect of contribution claims on the bankruptcy estate is at the very least conceivable, the ... action is related to the bankruptcy and subject to the jurisdiction of this Court.”), *see also In re Masterwear Corp.*, 241 B.R. 511, 516-17 (Bankr. S.D.N.Y. 1999) (holding that “related to” jurisdiction existed where defendants “may ultimately be entitled to recover some or all of their legal fees and expenses from [the bankrupt corporation] under [its] bylaws).



23. For any claims or parties not subject to jurisdiction under 28 U.S.C. § 1334, supplemental jurisdiction lies under 28 U.S.C. § 1367 because all claims against all parties in this case form part of the same case or controversy.

**Compliance With Procedural Requirements**

24. Pursuant to Fed. R. Bankr. P. Rule 9027: (a) this Notice of Removal is being filed with the clerk for the district and division within which the State Court Action is pending; (b) this Notice of Removal is signed pursuant to Fed. R. Bankr. P. Rule 9011; (c) Removing Defendant states that the State Court Action is a core proceeding, but if it is determined to be non-core, Removing Defendant consents to entry of final orders or judgment by the Bankruptcy Court; (d) this Notice of Removal is being timely filed; (e) this Notice of Removal is accompanied by a copy of all process and pleadings filed to date in the State Court Action, (f) Removing Defendant has contemporaneously filed a copy of this notice with the Clerk of the Supreme Court of the State of New York, County of Westchester and shall promptly serve a copy of this Notice of Removal upon Plaintiff's counsel.

25. Removing Defendant expressly reserves the right to raise all defenses in this action after it is removed.

WHEREFORE, the Removing Defendant removes the State Court Action in its entirety from the Supreme Court of the State of New York, Westchester County to the United States District Court for the Southern District of New York and respectfully submits that the matter should be referred to the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York  
November 3, 2021

Klestadt Winters Jureller Southard &  
Stevens, LLP

By: /s/ Tracy L. Klestadt

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60278/2020 - Westchester County Supreme Court

Short Caption: **White Plains Healthcare Properties I, LLC v. HBL SNF, LLC et al**  
Case Type: **Commercial Division**  
Case Status: **Active**  
eFiling Status: [Full Participation Recorded](#)  
Assigned Judge: **Gretchen Walsh**  
  
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#	Document	Filed By	Status
1	<a href="#">SUMMONS + COMPLAINT</a>	<a href="#">Donnellan, A.</a> Filed: 09/18/2020 Received: 09/18/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
2	<a href="#">EXHIBIT(S)</a> - 1 Operating Lease <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 09/18/2020 Received: 09/18/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
3	<a href="#">EXHIBIT(S)</a> - 2 Guaranty of Lease <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 09/18/2020 Received: 09/18/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
4	<a href="#">EXHIBIT(S)</a> - 3 Guaranty of Lease <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 09/18/2020 Received: 09/18/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
5	<a href="#">EXHIBIT(S)</a> - 4 Letter of Intent <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 09/18/2020 Received: 09/18/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
6	<a href="#">EXHIBIT(S)</a> - 5 Notice of Default	<a href="#">Donnellan, A.</a> Filed: 09/18/2020 Received: 09/18/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
7	<a href="#">AFFIRMATION/AFFIDAVIT OF SERVICE</a> Affidavit of service upon defendant HBL SNF, Inc	<a href="#">Coleman, W.</a> Filed: 10/28/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>

- |    |   |   |  |
|----|---|---|--|
| 8  | <a href="#"><u>AFFIRMATION/AFFIDAVIT OF SERVICE</u></a><br>affidavits of service of summons and complaint - all defendants        | <a href="#"><u>Coleman, W.</u></a><br>Filed: 10/07/2020<br>Received: 10/07/2020   | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 9  | <a href="#"><u>NOTICE OF MOTION</u></a> (Motion #1)   | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a><br><a href="#"><u>Payment Receipt</u></a> |
| 10 | <a href="#"><u>AFFIDAVIT OR AFFIRMATION IN SUPPORT OF MOTION</u></a> (Motion #1)<br>Affirmation of Default of Alfred E. Donnellan | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 11 | <a href="#"><u>EXHIBIT(S)</u></a> - 1 (Motion #1)<br>Complaint<br><b>Redacted</b> per 22 NYCRR §202.5(e)                          | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 12 | <a href="#"><u>EXHIBIT(S)</u></a> - 2 (Motion #1)<br>Affidavit of Service   | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 13 | <a href="#"><u>EXHIBIT(S)</u></a> - 3 (Motion #1)<br>Confirmation Notices   | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 14 | <a href="#"><u>EXHIBIT(S)</u></a> - 4 (Motion #1)<br>Additional Notice  | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 15 | <a href="#"><u>ORDER ( PROPOSED )</u></a> (Motion #1)   | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 16 | <a href="#"><u>BILL OF COSTS</u></a> (Motion #1)  | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 17 | <a href="#"><u>AFFIRMATION/AFFIDAVIT OF SERVICE</u></a> (Motion #1)   | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 18 | <a href="#"><u>RJI -RE: NOTICE OF MOTION</u></a> (Motion #1)  | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a><br><a href="#"><u>Payment Receipt</u></a> |
| 19 | <a href="#"><u>ADDENDUM - COMMERCIAL DIVISION (840C)</u></a><br>(Motion #1)   | <a href="#"><u>Donnellan, A.</u></a><br>Filed: 10/28/2020<br>Received: 10/28/2020 | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 20 | <a href="#"><u>COURT NOTICE</u></a>   | Court User<br>Filed: 10/29/2020<br>Received: 10/29/2020                           | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 21 | <a href="#"><u>ANSWER WITH COUNTER-CLAIM(S)</u></a>   | <a href="#"><u>Giardino, J.</u></a><br>Filed: 11/05/2020<br>Received: 11/05/2020  | <b>Processed</b><br><a href="#"><u>Confirmation Notice</u></a>   |
| 22 | <a href="#"><u>NOTICE OF CROSS-MOTION</u></a> (Motion #2)   | <a href="#"><u>Giardino, J.</u></a><br>Filed: 11/05/2020                          | <b>Processed</b>   |

	Filed: 11/05/2020 Received: 11/05/2020	<a href="#">Confirmation Notice</a> <a href="#">Payment Receipt</a>
23 <a href="#">AFFIDAVIT OR AFFIRMATION IN OPPOSITION TO MOTION AND IN SUPPORT OF CROSS-MOTION</a> (Motion #2)	<a href="#">Giardino, J.</a> Filed: 11/05/2020 Received: 11/05/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
24 <a href="#">EXHIBIT(S)</a> - A (Motion #2) <i>Email Correspondence</i>	<a href="#">Giardino, J.</a> Filed: 11/05/2020 Received: 11/05/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
25 <a href="#">EXHIBIT(S)</a> - B (Motion #2) <i>Proof of November Rent Payment</i>	<a href="#">Giardino, J.</a> Filed: 11/05/2020 Received: 11/05/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
26 <a href="#">EXHIBIT(S)</a> - C (Motion #2) <i>Filed Answer</i>	<a href="#">Giardino, J.</a> Filed: 11/05/2020 Received: 11/05/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
27 <a href="#">MEMORANDUM IN OPPOSITION TO MOTION AND IN SUPPORT OF CROSS-MOTION</a> (Motion #2)	<a href="#">Giardino, J.</a> Filed: 11/05/2020 Received: 11/05/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
28 <a href="#">ORDER ( PROPOSED )</a> (Motion #2)	<a href="#">Giardino, J.</a> Filed: 11/05/2020 Received: 11/05/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
29 <a href="#">STIPULATION - WITHDRAWING MOTION/ORDER TO SHOW CAUSE</a> (Motion #1)	<a href="#">Donnellan, A.</a> Filed: 11/09/2020 Received: 11/09/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
30 <a href="#">DECISION + ORDER ON MOTION</a> (Motion #1) <i>Motion withdrawn</i>	Court User Filed: 11/13/2020 Received: 11/10/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
31 <a href="#">DECISION + ORDER ON MOTION</a> (Motion #2) <i>Motion withdrawn</i>	Court User Filed: 11/13/2020 Received: 11/10/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
32 <a href="#">JOINT ONE PAGE STATEMENT OF FACTS &amp; PARTIES CONTENTIONS</a>	<a href="#">Donnellan, A.</a> Filed: 11/12/2020 Received: 11/12/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
33 <a href="#">EXHIBIT(S)</a> - 1 <i>Copy of Pleadings</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 11/12/2020 Received: 11/12/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
34 <a href="#">PRELIMINARY CONFERENCE ORDER (PROPOSED)</a>	<a href="#">Donnellan, A.</a> Filed: 11/12/2020 Received: 11/12/2020	*** Pending *** <a href="#">Confirmation Notice</a>
35 <a href="#">EXHIBIT(S)</a> - 1 <i>ADR Attorney Certification for Alfred Donnellan</i>	<a href="#">Donnellan, A.</a> Filed: 11/12/2020 Received: 11/12/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
36 <a href="#">ORDER - PRELIMINARY CONFERENCE</a>	Court User Filed: 11/13/2020 Received: 11/13/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
37 <a href="#">COMPLAINT (AMENDED)</a>	<a href="#">Donnellan, A.</a>	<b>Processed</b>

	<i>Amended Verified Complaint</i>	Filed: 11/30/2020 Received: 11/30/2020	<a href="#">Confirmation Notice</a>
38	<a href="#">EXHIBIT(S)</a> - 1 <i>Amended and Restated Operating Lease</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 11/30/2020 Received: 11/30/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
39	<a href="#">EXHIBIT(S)</a> - 2 <i>Jozefovic Guaranty of Lease</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 11/30/2020 Received: 11/30/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
40	<a href="#">EXHIBIT(S)</a> - 3 <i>Neuman Guaranty of Lease</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 11/30/2020 Received: 11/30/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
41	<a href="#">EXHIBIT(S)</a> - 4 <i>Jozefovic Security Agreement</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 11/30/2020 Received: 11/30/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
42	<a href="#">EXHIBIT(S)</a> - 5 <i>Letter of Intent</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 11/30/2020 Received: 11/30/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
43	<a href="#">EXHIBIT(S)</a> - 6 <i>Notice of Default</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 11/30/2020 Received: 11/30/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
44	<a href="#">LETTER / CORRESPONDENCE TO JUDGE</a> <i>Letter to Judge Walsh requesting pre motion conference</i>	<a href="#">Donnellan, A.</a> Filed: 12/04/2020 Received: 12/04/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
45	<a href="#">EXHIBIT(S)</a> - 1 <i>Amended complaint</i>	<a href="#">Donnellan, A.</a> Filed: 12/04/2020 Received: 12/04/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
46	<a href="#">EXHIBIT(S)</a> - 2 <i>December 2, 2020 letter</i>	<a href="#">Donnellan, A.</a> Filed: 12/04/2020 Received: 12/04/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
47	<a href="#">EXHIBIT(S)</a> - 3 <i>Compared version of amended complaint</i>	<a href="#">Donnellan, A.</a> Filed: 12/04/2020 Received: 12/04/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
48	<a href="#">ANSWER TO THIRD PARTY COMPLAINT</a> <i>Verified Answer to Third Party Complaint</i>	<a href="#">Donnellan, A.</a> Filed: 12/11/2020 Received: 12/11/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
49	<a href="#">REPLY TO COUNTERCLAIM(S)</a> <i>Verified Reply to Counterclaims</i>	<a href="#">Donnellan, A.</a> Filed: 12/11/2020 Received: 12/11/2020	<b>Processed</b> <a href="#">Confirmation Notice</a>
50	<a href="#">LETTER / CORRESPONDENCE TO JUDGE</a>	<a href="#">Donnellan, A.</a> Filed: 01/11/2021 Received: 01/11/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
51	<a href="#">NOTICE OF MOTION</a> (Motion #3) <i>to file Amended Complaint</i>	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a> <a href="#">Payment Receipt</a>
52	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT OF</a>	<a href="#">Donnellan, A.</a>	<b>Processed</b>

	<a href="#">MOTION</a> (Motion #3) <i>Affirmation of Alfred E. Donnellan in Support of Motion to file Amended Complaint</i>	Filed: 01/26/2021 Received: 01/26/2021	<a href="#">Confirmation Notice</a>
53	<a href="#">EXHIBIT(S)</a> - A (Motion #3) <i>Complaint with exhibits</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
54	<a href="#">EXHIBIT(S)</a> - B (Motion #3) <i>Verified Answer</i>	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
55	<a href="#">EXHIBIT(S)</a> - C (Motion #3) <i>Amended Complaint with exhibits</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
56	<a href="#">EXHIBIT(S)</a> - D (Motion #3) <i>Redline version of Amended Complaint</i>	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
57	<a href="#">EXHIBIT(S)</a> - E (Motion #3) <i>December 2, 2020 letter</i>	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
58	<a href="#">EXHIBIT(S)</a> - F (Motion #3) <i>Security Agreement</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
59	<a href="#">EXHIBIT(S)</a> - G (Motion #3) <i>Lease</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
60	<a href="#">EXHIBIT(S)</a> - H (Motion #3) <i>NY County Action Answer</i>	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
61	<a href="#">MEMORANDUM OF LAW IN SUPPORT</a> (Motion #3)	<a href="#">Donnellan, A.</a> Filed: 01/26/2021 Received: 01/26/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
62	<a href="#">NOTICE OF MOTION</a> (Motion #4) *Corrected*	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/04/2021	<b>Processed</b> <a href="#">Confirmation Notice</a> <a href="#">Payment Receipt</a>
63	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT OF MOTION</a> (Motion #4) <i>Affirmation of Alfred E. Donnellan</i>	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
64	<a href="#">EXHIBIT(S)</a> - A (Motion #4) <i>Complaint</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
65	<a href="#">EXHIBIT(S)</a> - B (Motion #4) <i>Answer</i>	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
66	<a href="#">EXHIBIT(S)</a> - C (Motion #4) <i>Development Agreement</i>	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

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67	<u>EXHIBIT(S)</u> - D (Motion #4) <i>Lease</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
68	<u>EXHIBIT(S)</u> - E (Motion #4) <i>Temporary Certificate of Occupancy</i>	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
69	<u>EXHIBIT(S)</u> - F (Motion #4) <i>AJA Form 0704</i>	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
70	<u>EXHIBIT(S)</u> - G (Motion #4) <i>NYSDOH Communication</i>	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
71	<u>MEMORANDUM OF LAW IN SUPPORT</u> (Motion #4)	<a href="#">Donnellan, A.</a> Filed: 02/03/2021 Received: 02/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
72	<u>LETTER / CORRESPONDENCE TO JUDGE</u>	<a href="#">Donnellan, A.</a> Filed: 02/04/2021 Received: 02/04/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
73	<u>MEMORANDUM OF LAW IN OPPOSITION</u> (Motion #3)	<a href="#">Giardino, J.</a> Filed: 02/05/2021 Received: 02/05/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
74	<u>AFFIDAVIT OR AFFIRMATION IN OPPOSITION TO MOTION</u> (Motion #3)	<a href="#">Giardino, J.</a> Filed: 02/05/2021 Received: 02/05/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
75	<u>EXHIBIT(S)</u> - A (Motion #3) <i>Collateral Assignment</i>	<a href="#">Giardino, J.</a> Filed: 02/05/2021 Received: 02/05/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>





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76	<a href="#">EXHIBIT(S)</a> - B (Motion #3) <i>Notification of Disposition of Collateral</i>	<a href="#">Giardino, J.</a> Filed: 02/05/2021 Received: 02/05/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
77	<a href="#">EXHIBIT(S)</a> - C (Motion #3) <i>Complaint in New York Action</i>	<a href="#">Giardino, J.</a> Filed: 02/05/2021 Received: 02/05/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
78	<a href="#">EXHIBIT(S)</a> - D (Motion #3) <i>Judge Bannon's Interim Order</i>	<a href="#">Giardino, J.</a> Filed: 02/05/2021 Received: 02/05/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
79	<a href="#">AFFIDAVIT OR AFFIRMATION IN REPLY</a> (Motion #3) <i>Reply Affirmation of Alfred E. Donnellan</i>	<a href="#">Donnellan, A.</a> Filed: 02/18/2021 Received: 02/18/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
80	<a href="#">EXHIBIT(S)</a> - A (Motion #3) <i>NY County Complaint</i>	<a href="#">Donnellan, A.</a> Filed: 02/18/2021 Received: 02/18/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
81	<a href="#">MEMORANDUM OF LAW IN REPLY</a> (Motion #3)	<a href="#">Donnellan, A.</a> Filed: 02/18/2021 Received: 02/18/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
82	<a href="#">STIPULATION - DISCOVERY ( REQUEST TO SO</a> <i>ORDER</i> (Motion #4)	<a href="#">Giardino, J.</a> Filed: 02/04/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

	<u>ORDER</u> (MOTION #2)	Received: 03/04/2021	
	Stipulation regarding document discovery and motion to dismiss		
83	<u>STIPULATION - SO ORDERED</u>	Court User Filed: 03/11/2021 Received: 03/11/2021	Processed <a href="#">Confirmation Notice</a>
84	<u>DECISION + ORDER ON MOTION</u> (Motion #3)	Court User Filed: 03/18/2021 Received: 03/18/2021	Processed <a href="#">Confirmation Notice</a>
85	<u>NOTICE OF ENTRY</u> (Motion #3)	<a href="#">Lara-Garduno, N.</a> Filed: 03/19/2021 Received: 03/19/2021	Processed <a href="#">Confirmation Notice</a>
86	<u>COMPLAINT (AMENDED)</u> First Amended Verified Complaint	<a href="#">Donnellan, A.</a> Filed: 03/22/2021 Received: 03/22/2021	Processed <a href="#">Confirmation Notice</a>
87	<u>EXHIBIT(S)</u> - 1 Amended and Restated Lease <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 03/22/2021 Received: 03/22/2021	Processed <a href="#">Confirmation Notice</a>
88	<u>EXHIBIT(S)</u> - 2 Jozefovic Guaranty of Lease <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 03/22/2021 Received: 03/22/2021	Processed <a href="#">Confirmation Notice</a>
89	<u>EXHIBIT(S)</u> - 3 Neuman Guaranty of Lease <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 03/22/2021 Received: 03/22/2021	Processed <a href="#">Confirmation Notice</a>
90	<u>EXHIBIT(S)</u> - 4 Jozefovic Security Agreement <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 03/22/2021 Received: 03/22/2021	Processed <a href="#">Confirmation Notice</a>
91	<u>EXHIBIT(S)</u> - 5 Letter of Intent <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 03/22/2021 Received: 03/22/2021	Processed <a href="#">Confirmation Notice</a>
92	<u>EXHIBIT(S)</u> - 6 Notice of Default <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 03/22/2021 Received: 03/22/2021	Processed <a href="#">Confirmation Notice</a>
93	<u>LETTER / CORRESPONDENCE TO JUDGE</u>	<a href="#">Lara-Garduno, N.</a> Filed: 03/26/2021 Received: 03/26/2021	Processed <a href="#">Confirmation Notice</a>
94	<u>LETTER / CORRESPONDENCE TO JUDGE</u>	<a href="#">Donnellan, A.</a> Filed: 04/09/2021 Received: 04/09/2021	Processed <a href="#">Confirmation Notice</a>
95	<u>DECISION + ORDER ON MOTION</u> (Motion #4) Motion withdrawn without prejudice	Court User Filed: 04/20/2021 Received: 04/20/2021	Processed <a href="#">Confirmation Notice</a>
96	<u>ANSWER (AMENDED)</u>	<a href="#">Barnett-Howell, A.</a> Filed: 05/21/2021 Received: 05/21/2021	Processed <a href="#">Confirmation Notice</a>

97	<a href="#">EXHIBIT(S)</a> - A <i>Incorporated Complaint from New York County</i>	<a href="#">Barnett-Howell, A.</a> Filed: 05/21/2021 Received: 05/21/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
98	<a href="#">LETTER / CORRESPONDENCE TO JUDGE</a>	<a href="#">Donnellan, A.</a> Filed: 05/25/2021 Received: 05/25/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
99	<a href="#">NOTICE TO ADMIT</a>	<a href="#">Lara-Garduno, N.</a> Filed: 06/02/2021 Received: 06/02/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
100	<a href="#">EXHIBIT(S)</a> - 1 <i>to Notice to Admit - Lease</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Lara-Garduno, N.</a> Filed: 06/02/2021 Received: 06/02/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
101	<a href="#">EXHIBIT(S)</a> - 2 <i>to Notice to Admit - Development Agreement</i>	<a href="#">Lara-Garduno, N.</a> Filed: 06/02/2021 Received: 06/02/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
102	<a href="#">EXHIBIT(S)</a> - 3 <i>to Notice to Admit - Temporary C of O</i>	<a href="#">Lara-Garduno, N.</a> Filed: 06/02/2021 Received: 06/02/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
103	<a href="#">EXHIBIT(S)</a> - 4 <i>to Notice to Admit - AJA form 0704</i>	<a href="#">Lara-Garduno, N.</a> Filed: 06/02/2021 Received: 06/02/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
104	<a href="#">EXHIBIT(S)</a> - 5 <i>to Notice to Admit - NYSDOH letter</i>	<a href="#">Lara-Garduno, N.</a> Filed: 06/02/2021 Received: 06/02/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
105	<a href="#">ORDER - MEDIATION</a>	Court User Filed: 06/03/2021 Received: 06/03/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
106	<a href="#">ORDER TO SHOW CAUSE ( PROPOSED )</a> (Motion #5)	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a> <a href="#">Payment Receipt</a>
107	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT OF PROPOSED OSC/EXPARTE APP</a> (Motion #5)	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
108	<a href="#">EXHIBIT(S)</a> - A (Motion #5) <i>First Notification of Disposition of Collateral, 10.6.20</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
109	<a href="#">EXHIBIT(S)</a> - B (Motion #5) <i>Second Notification of Disposition of Collateral, 6.9.21</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
110	<a href="#">EXHIBIT(S)</a> - C (Motion #5) <i>Term Sheet, 11.20.15</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
111	<a href="#">EXHIBIT(S)</a> - D (Motion #5) <i>Collateral Assignment</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

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112	<a href="#">EXHIBIT(S)</a> - E (Motion #5) <i>November 19 Email and Account Statement</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
113	<a href="#">EXHIBIT(S)</a> - F (Motion #5) <i>August 10 Email</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
114	<a href="#">EXHIBIT(S)</a> - G (Motion #5) <i>August 16 Emails</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
115	<a href="#">EXHIBIT(S)</a> - H (Motion #5) <i>August 17 Email</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
116	<a href="#">EXHIBIT(S)</a> - I (Motion #5) <i>Letter of Intent</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
117	<a href="#">EXHIBIT(S)</a> - J (Motion #5) <i>Security Benefit Letters</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
118	<a href="#">EXHIBIT(S)</a> - K (Motion #5) <i>NYSDOH Letter</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
119	<a href="#">EXHIBIT(S)</a> - L (Motion #5) <i>Certificate of Amendment</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
120	<a href="#">EXHIBIT(S)</a> - M (Motion #5) <i>2020 Monthly Invoices</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
121	<a href="#">EXHIBIT(S)</a> - N (Motion #5) <i>September Letter</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
122	<a href="#">EXHIBIT(S)</a> - O (Motion #5) <i>Proposed UCC Form</i>	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
123	<a href="#">MEMORANDUM OF LAW IN SUPPORT</a> (Motion #5)	<a href="#">Barnett-Howell, A.</a> Filed: 06/22/2021 Received: 06/22/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
124	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT</a> (Motion #5) <i>Affirmation of Robert J. Malatak in Partial Joinder and Support of Defendants' / Third-Party Plainti ...</i> <a href="#">show more</a>	<a href="#">Malatak, R.</a> Filed: 06/25/2021 Received: 06/25/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
125	<a href="#">EXHIBIT(S)</a> - 1 (Motion #5) <i>Exhibit 1 - Bandazian Affidavit</i>	<a href="#">Malatak, R.</a> Filed: 06/25/2021 Received: 06/25/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
126	<a href="#">EXHIBIT(S)</a> - 2 (Motion #5) <i>Exhibit 2 - Prior Order to Show Cause</i>	<a href="#">Malatak, R.</a> Filed: 06/25/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

		Received: 06/25/2021	
127	<a href="#">EXHIBIT(S)</a> - 3 (Motion #5) <i>Exhibit 3 - Answer with Cross-Claims</i>	<a href="#">Malatak, R.</a> Filed: 06/25/2021 Received: 06/25/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
128	<a href="#">EXHIBIT(S)</a> - 4 (Motion #5) <i>Exhibit 4 - Decision and Order</i>	<a href="#">Malatak, R.</a> Filed: 06/25/2021 Received: 06/25/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
129	<a href="#">EXHIBIT(S)</a> - 5 (Motion #5) <i>Exhibit 5 - Notice of Sale</i>	<a href="#">Malatak, R.</a> Filed: 06/25/2021 Received: 06/25/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
130	<a href="#">MEMORANDUM OF LAW IN SUPPORT</a> (Motion #5) <i>Third-Party Defendant/Cross-Claimant Metropolitan Commercial Bank's Memorandum of Law in Partial Joinder ... show more</i>	<a href="#">Malatak, R.</a> Filed: 06/25/2021 Received: 06/25/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
131	<a href="#">LETTER / CORRESPONDENCE TO JUDGE</a> (Motion #5)	<a href="#">Donnellan, A.</a> Filed: 06/28/2021 Received: 06/28/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
132	<a href="#">LETTER / CORRESPONDENCE TO JUDGE</a> (Motion #5)	<a href="#">Giardino, J.</a> Filed: 06/28/2021 Received: 06/28/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
133	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT OF PROPOSED OSC/EX PARTE APP</a> (Motion #5) <i>Affidavit of Lizer Jozefovic</i>	<a href="#">Giardino, J.</a> Filed: 06/28/2021 Received: 06/28/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
134	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT</a> (Motion #5) <i>Supplemental Affirmation of Robert J. Malatak in Partial Joinder and Support of Defendants' Third-Party ... show more</i>	<a href="#">Malatak, R.</a> Filed: 06/28/2021 Received: 06/28/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
135	<a href="#">LETTER / CORRESPONDENCE TO JUDGE</a> (Motion #5)	<a href="#">Giardino, J.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
136	<a href="#">AFFIDAVIT OR AFFIRMATION IN OPPOSITION TO ORDER TO SHOW CAUSE</a> (Motion #5) <i>Affidavit of William A. Nicholson</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
137	<a href="#">EXHIBIT(S)</a> - A (Motion #5) <i>Lease</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
138	<a href="#">EXHIBIT(S)</a> - B (Motion #5) <i>Jozefovic Guaranty</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
139	<a href="#">EXHIBIT(S)</a> - C (Motion #5) <i>Neuman Guaranty</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
140	<a href="#">EXHIBIT(S)</a> - D (Motion #5) <i>Collateral Assignment and Pledge</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

	<b>Redacted</b> per 22 NYCRR §202.5(e)	Received: 06/29/2021	
141	<a href="#">EXHIBIT(S)</a> - E (Motion #5) <i>UCC Financing Statement</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
142	<a href="#">EXHIBIT(S)</a> - F (Motion #5) <i>Notice of Default</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
143	<a href="#">EXHIBIT(S)</a> - G (Motion #5) <i>Construction Loan Agreement</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
144	<a href="#">EXHIBIT(S)</a> - H (Motion #5) <i>Note</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
145	<a href="#">EXHIBIT(S)</a> - I (Motion #5) <i>Mortgage</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
146	<a href="#">EXHIBIT(S)</a> - J (Motion #5) <i>Security Benefit Notice of Default</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
147	<a href="#">EXHIBIT(S)</a> - K (Motion #5) <i>Security Benefit Notice of Default</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
148	<a href="#">EXHIBIT(S)</a> - L (Motion #5) <i>Security Benefit Complaint</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
149	<a href="#">EXHIBIT(S)</a> - M (Motion #5) <i>Email</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
150	<a href="#">EXHIBIT(S)</a> - N (Motion #5) <i>Hebrew Hospital Bankruptcy Filing Notice</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

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Short Caption: **White Plains Healthcare Properties I, LLC v. HBL SNF, LLC et al**  
Case Type: **Commercial Division**  
Case Status: **Active**  
eFiling Status: [Full Participation Recorded](#)  
Assigned Judge: **Gretchen Walsh**  
  
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151	<a href="#">EXHIBIT(S)</a> - O (Motion #5) NYDOH letter	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
152	<a href="#">EXHIBIT(S)</a> - P (Motion #5) Pinnacle letter	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
153	<a href="#">EXHIBIT(S)</a> - Q (Motion #5) Pinnacle letter	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
154	<a href="#">EXHIBIT(S)</a> - R (Motion #5) Email	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
155	<a href="#">EXHIBIT(S)</a> - S (Motion #5) Bankruptcy Court Order	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
156	<a href="#">EXHIBIT(S)</a> - T (Motion #5) Operating Agreement	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
157	<a href="#">EXHIBIT(S)</a> - U (Motion #5) NYDOH letter	<a href="#">Donnellan, A.</a> Filed: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

158	<a href="#">EXHIBIT(S)</a> - V (Motion #5) <i>Development Agreement</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
159	<a href="#">EXHIBIT(S)</a> - W (Motion #5) <i>Letter of Intent</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
160	<a href="#">AFFIDAVIT OR AFFIRMATION IN OPPOSITION TO ORDER TO SHOW CAUSE</a> (Motion #5) <i>Affirmation of Alfred E. Donnellan</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
161	<a href="#">EXHIBIT(S)</a> - X (Motion #5) <i>Notification of Disposition of Collateral</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
162	<a href="#">EXHIBIT(S)</a> - Y (Motion #5) <i>June 10, 2021 Letter</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
163	<a href="#">EXHIBIT(S)</a> - Z (Motion #5) <i>Publication</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
164	<a href="#">EXHIBIT(S)</a> - AA (Motion #5) <i>Terms of Sale</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
165	<a href="#">EXHIBIT(S)</a> - BB (Motion #5) <i>Amended and Restated Operating Agreement of Waterview</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
166	<a href="#">AFFIDAVIT OR AFFIRMATION IN OPPOSITION TO ORDER TO SHOW CAUSE</a> (Motion #5) <i>Affidavit of Howard Fensterman</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
167	<a href="#">EXHIBIT(S)</a> - CC (Motion #5) <i>Email</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
168	<a href="#">EXHIBIT(S)</a> - DD (Motion #5) <i>Fed Ex Receipt</i>	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
169	<a href="#">MEMORANDUM OF LAW IN OPPOSITION</a> (Motion #5)	<a href="#">Donnellan, A.</a> Filed: 06/29/2021 Received: 06/29/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
170	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT</a> (Motion #5) <i>Supplemental Affidavit of Brett Bandazian in Partial Joinder and Support of Defendants'/Third-Party ...</i> <a href="#">show more</a>	<a href="#">Malatak, R.</a> Filed: 06/30/2021 Received: 06/30/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
171	<a href="#">EXHIBIT(S)</a> - 6 (Motion #5) <i>Exhibit 6 Certificate</i>	<a href="#">Malatak, R.</a> Filed: 06/30/2021 Received: 06/30/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

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172	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT OF CROSS-MOTION</a> (Motion #5) <i>Second Supplemental Affirmation of Robert J. Malatak in Partial Joinder and Support of Defendants'/T ... show more</i>	<a href="#">Malatak, R.</a> Filed: 06/30/2021 Received: 06/30/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
173	<a href="#">EXHIBIT(S)</a> - 7 (Motion #5) <i>Exhibit 7 - Article</i>	<a href="#">Malatak, R.</a> Filed: 06/30/2021 Received: 06/30/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
174	<a href="#">ORDER TO SHOW CAUSE</a> (Motion #5)	Court User Filed: 06/30/2021 Received: 06/30/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
175	<a href="#">NOTICE OF ENTRY</a>	<a href="#">Giardino, J.</a> Filed: 06/30/2021 Received: 06/30/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
176	<a href="#">NOTICE OF APPEAL/INFORMATIONAL STATEMENT/COPY OF ORDER/PROOF OF SERVICE</a> *Corrected*	<a href="#">Giardino, J.</a> Filed: 06/30/2021 Received: 07/01/2021	<b>Processed</b> <a href="#">Confirmation Notice</a> <a href="#">Payment Receipt</a>
177	<a href="#">NOTICE OF APPEAL/INFORMATIONAL STATEMENT/COPY OF ORDER/PROOF OF SERVICE</a> (Motion #5) *Corrected* <i>Notice of Appeal</i>	<a href="#">Malatak, R.</a> Filed: 06/30/2021 Received: 07/01/2021	<b>Processed</b> <a href="#">Confirmation Notice</a> <a href="#">Payment Receipt</a>
178	<a href="#">COUNTY CLERK CERTIFICATION OF MINUTES</a>	Court User Filed: 07/28/2021 Received: 07/28/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
179	<a href="#">RECEIPT OF FILE - TRANSFER CASE</a> <i>NY County File Part 1 of 2- Transfer and consolidation of NY County Index 655549/2020</i>	Court User Filed: 07/28/2021 Received: 07/28/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
180	<a href="#">RECEIPT OF FILE - TRANSFER CASE</a> <i>NY County File Part 2 of 2- Transfer and consolidation of NY County Index 655549/2020</i>	Court User Filed: 07/28/2021 Received: 07/28/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
181	<a href="#">LETTER / CORRESPONDENCE TO JUDGE</a>	<a href="#">Donnellan, A.</a> Filed: 08/10/2021 Received: 08/10/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
182	<a href="#">LETTER / CORRESPONDENCE TO JUDGE</a>	<a href="#">Donnellan, A.</a> Filed: 08/13/2021 Received: 08/13/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
183	<a href="#">NOTICE OF MOTION</a> (Motion #6)	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a> <a href="#">Payment Receipt</a>
184	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT OF MOTION</a> (Motion #6) <i>Affirmation of Alfred E. Donnellan, Esq.</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
185	<a href="#">EXHIBIT(S)</a> - 1 (Motion #6) <i>Summons &amp; Complaint - Westchester County action</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

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186	<a href="#">EXHIBIT(S)</a> - 2 (Motion #6) <i>Answer with Counterclaims and Third Party Complaint</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
187	<a href="#">EXHIBIT(S)</a> - 3 (Motion #6) <i>Amended Verified Complaint 2020.11.30</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
188	<a href="#">EXHIBIT(S)</a> - 4 (Motion #6) <i>Reply to Counterclaims and Answer to Third-Party Complaint</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
189	<a href="#">EXHIBIT(S)</a> - 5 (Motion #6) <i>First Amended Verified Complaint 2021.03.22</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
190	<a href="#">EXHIBIT(S)</a> - 6 (Motion #6) <i>Summons &amp; Complaint - NY County</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
191	<a href="#">EXHIBIT(S)</a> - 7 (Motion #6) <i>Answer - NY County</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
192	<a href="#">EXHIBIT(S)</a> - 8 (Motion #6) <i>Answer of MCB - NY County</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
193	<a href="#">EXHIBIT(S)</a> - 9 (Motion #6) <i>Decision and Order 2021.04.08</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
194	<a href="#">EXHIBIT(S)</a> - 10 (Motion #6) <i>First Amended Verified Answer</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
195	<a href="#">EXHIBIT(S)</a> - 11 (Motion #6) <i>Notice to Admit with exhibits</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
196	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT OF MOTION</a> (Motion #6) <i>Affidavit of William Nicholson</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
197	<a href="#">EXHIBIT(S)</a> - 12 (Motion #6) <i>Lease</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
198	<a href="#">EXHIBIT(S)</a> - 13 (Motion #6) <i>Development Agreement</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
199	<a href="#">EXHIBIT(S)</a> - 14 (Motion #6) <i>Jozefovic Guaranty</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
200	<a href="#">EXHIBIT(S)</a> - 15 (Motion #6) <i>Neuman Guaranty</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

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201	<a href="#">EXHIBIT(S)</a> - 16 (Motion #6) <i>Pledge Agreement</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
202	<a href="#">EXHIBIT(S)</a> - 17 (Motion #6) <i>Letter of Intent</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
203	<a href="#">EXHIBIT(S)</a> - 18 (Motion #6) <i>White Plains TCO</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
204	<a href="#">EXHIBIT(S)</a> - 19 (Motion #6) <i>AIA form G704</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
205	<a href="#">EXHIBIT(S)</a> - 20 (Motion #6) <i>NYSDOH letter 2019.12.02</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
206	<a href="#">EXHIBIT(S)</a> - 21 (Motion #6) <i>NYSDOH email 2019.10.01</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
207	<a href="#">EXHIBIT(S)</a> - 22 (Motion #6) <i>Term Sheet 2015.11.20</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
208	<a href="#">EXHIBIT(S)</a> - 23 (Motion #6) <i>Jozefovic Affidavit</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
209	<a href="#">EXHIBIT(S)</a> - 35 (Motion #6) <i>Operating Lease</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
210	<a href="#">EXHIBIT(S)</a> - 36 (Motion #6) <i>Zafrin e-mail dated 4-11-17</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
211	<a href="#">EXHIBIT(S)</a> - 37 (Motion #6) <i>Estoppel Certificate to Security Benefit</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
212	<a href="#">AFFIDAVIT OR AFFIRMATION IN SUPPORT OF MOTION</a> (Motion #6) <i>Affidavit of Edward Tabor</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
213	<a href="#">EXHIBIT(S)</a> - 24 (Motion #6) <i>Itemization of amounts due under lease and LOI</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
214	<a href="#">EXHIBIT(S)</a> - 25 (Motion #6) <i>List of Rents &amp; Late Charges</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
215	<a href="#">EXHIBIT(S)</a> - 26 (Motion #6) <i>Notice of Default</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>




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216	<a href="#">EXHIBIT(S)</a> - 27 (Motion #6) <i>Accelerated Rent (NPV)</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
217	<a href="#">EXHIBIT(S)</a> - 28 (Motion #6) <i>Professional Fees</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
218	<a href="#">EXHIBIT(S)</a> - 29 (Motion #6) <i>Security Benefit Notice of Default dated 4-16-20</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
219	<a href="#">EXHIBIT(S)</a> - 30 (Motion #6) <i>Notice of Default 5-22-20</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
220	<a href="#">EXHIBIT(S)</a> - 31 (Motion #6) <i>Complaint in Security Benefit Foreclosure Action</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
221	<a href="#">EXHIBIT(S)</a> - 32 (Motion #6) <i>Itemization of Amounts Due</i> <b>Redacted</b> per 22 NYCRR §202.5(e)	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
222	<a href="#">EXHIBIT(S)</a> - 33 (Motion #6) <i>Unreimbursed Deposits and Payments</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
223	<a href="#">EXHIBIT(S)</a> - 38 (Motion #6) <i>Payment of Real Estate Taxes</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
224	<a href="#">EXHIBIT(S)</a> - 39 (Motion #6) <i>Certificates of Insurance</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>
225	<a href="#">EXHIBIT(S)</a> - 40 (Motion #6) <i>Tenant Insurance Analysis</i>	<a href="#">Donnellan, A.</a> Filed: 08/19/2021 Received: 08/19/2021	<b>Processed</b> <a href="#">Confirmation Notice</a>

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